EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

NORFOLK COUNTY RETIREMENT SYSTEM and PLUMBERS LOCAL UNION 519 PENSION TRUST, individually and on behalf of all others similarly situated, **Plaintiffs,** **v.** **DANIEL C. USTIAN, ROBERT C. LANNERT, MARK T. SCHWETSCHENAU, NAVISTAR INTERNATIONAL CORPORATION, and DELOITTE & TOUCHE LLP,** **Defendants.**	)	**Case No. 07-cv-07014** **Judge Robert W. Gettleman** **Magistrate Judge Nan R. Nolan**

NAVISTAR DEFENDANTS' OBJECTIONS AND RESPONSES TO LEAD PLAINTIFFS' FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO ALL DEFENDANTS

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Defendants Navistar International Corporation, Daniel C. Ustian and Robert C. Lannert (each a "Navistar Defendant," and collectively, the "Navistar Defendants"), by their attorneys, hereby object and respond to Lead Plaintiffs' First Request for Production of Documents to All Defendants ("Requests"), dated September 29, 2009, as follows:

PRELIMINARY STATEMENT

These responses are provided without prejudice to the Navistar Defendants' right to modify, amend or supplement these responses if additional facts or information come to its attention in the course of the Navistar Defendants' continuing investigation. This reservation, however, is not to be construed as an undertaking by the Navistar Defendants of an affirmative duty to change or supplement these responses, except as otherwise required by law or the Federal Rules of Civil Procedure. The fact that the Navistar Defendants have responded to one or more of the Requests is not intended and shall not be construed as waiver of all or any part of any objection to any such Request. By making these responses, the Navistar Defendants do not concede that the information sought is relevant or reasonably calculated to lead to the discovery of admissible evidence. Except for explicit acts stated herein, no incidental or implied admissions are intended.

GENERAL OBJECTIONS

A. The Navistar Defendants object to the Requests and the definitions and instructions set forth in the Requests to the extent the Requests, definitions and/or instructions call for a legal conclusion or purport to impose obligations on the Navistar Defendants that exceed or are inconsistent with the obligations imposed upon a responding party under the Federal Rules of Civil Procedure and/or applicable local rules.

B. The Navistar Defendants further object to the Requests to the extent they seek materials or information beyond the scope of the Court's September 10, 2009 Scheduling Order ("Scheduling Order") pertaining to class certification discovery.

C. The Navistar Defendants further object to the Requests to the extent they seek information protected from disclosure by the attorney-client privilege, the work-product doctrine, the common interest privilege, the auditor privilege, or any other applicable privilege, doctrine or protection. Any inadvertent disclosure of such information shall not be deemed a waiver of any applicable privilege or immunity recognized by law.

D. The Navistar Defendants further object to the Requests to the extent they are unduly burdensome, vague, ambiguous, incapable of reasonable ascertainment, and/or impossible to address as written.

E. The Navistar Defendants further object to the Requests to the extent they are overly broad, seek information not reasonably limited in time or scope or to the relevant time period in question, and/or would require undue burden or expense to respond. To the extent a Request is reasonable and not subject to other objections, the Navistar Defendants will conduct reasonable searches of the records and electronically stored information ("ESI") of relevant

Navistar custodians for the relevant time period to find responsive, non-privileged documents. The fact that the Navistar Defendants have agreed in a response to produce certain documents responsive to certain Requests should not be construed as a representation that responsive documents will in fact be located after a reasonable search.

F. The Navistar Defendants further object to the Requests to the extent they seek information that is not relevant to the claim or defense of any party, that is beyond the scope of the lawsuit, and/or that is not reasonably calculated to lead to the discovery of admissible evidence. No response to these Requests by the Navistar Defendants shall be deemed to constitute any agreement or concession that the subject matter thereof is relevant to this action, and any information provided by the Navistar Defendants shall be made without in any way waiving or intending to waive any objection thereto, including but not limited to relevance, privilege or admissibility.

G. The Navistar Defendants further object to the Requests to the extent they misstate facts and/or assume facts not in evidence and/or facts which do not exist or are otherwise incorrect.

H. The Navistar Defendants further object to the Requests to the extent they seek information that is equally available to Lead Plaintiffs in the public domain or available from sources other than the Navistar Defendants, or that is equally available to or already in the possession, custody or control of Lead Plaintiffs or their attorneys and for which the burden on Lead Plaintiffs to obtain the information is no greater than the burden on the Navistar Defendants.

I. The Navistar Defendants further object to the Requests to the extent they are cumulative and/or duplicative.

J. The Navistar Defendants further object to the Requests to the extent they seek information and identification of facts not in the Navistar Defendants' possession, custody or control.

K. The Navistar Defendants further object to the Requests to the extent that they do not specify a time period and are thus unduly burdensome and/or seek materials or information outside of the applicable statutes of limitation and/or the defined "Class Period" in Lead Plaintiffs' Consolidated Class Action Complaint ("Amended Complaint"), filed May 8, 2008.

L. The Navistar Defendants further object to the Requests to the extent they seek confidential information and/or proprietary information. Such information, to the extent it is not privileged or otherwise objectionable, will nevertheless be provided pursuant to the Protective Order, executed in this litigation and entered by the Court on October 19, 2009.

M. The Navistar Defendants further object to the Requests to the extent they seek the confidential information of third parties that any Navistar Defendant is under an obligation not to disclose.

N. The Navistar Defendants further object to the Requests to the extent that they seek information related to personnel and/or similar files the disclosure of which would constitute an invasion of employees' personal privacy.

O. The Navistar Defendants further object to Instruction No. 8 to the Requests as overly broad and unduly burdensome. The Navistar Defendants will construe the time period for documents subject to the Requests, unless otherwise specified, as the proposed Class Period defined in the Amended Complaint.

P. The Navistar Defendants expressly reserve the right to modify, amend or supplement its responses to the Requests.

Q. Each of the foregoing General Objections shall be deemed to apply to the Navistar Defendants' specific objections and responses set forth below, notwithstanding the fact that the Navistar Defendants have responded to all or part of any Request.

OBJECTIONS AND RESPONSES TO REQUESTS

REQUEST NO. 1:

All documents concerning the efficiency of the market for shares of Navistar common stock.

RESPONSE:

The Navistar Defendants hereby incorporate their General Objections as and for their objections to Request No. 1. The Navistar Defendants further object to Request No. 1 as vague, ambiguous and incapable of reasonable ascertainment. The Navistar Defendants further object to Request No. 1 as overly broad and unduly burdensome. The Navistar Defendants further object to Request No. 1 to the extent it seeks information that is equally available to Lead Plaintiffs in the public domain or available from sources other than the Navistar Defendants, or that is equally available to or already in the possession, custody or control of Lead Plaintiffs or their attorneys and for which the burden on Lead Plaintiffs to obtain the information is no greater than the burden on the Navistar Defendants.

REQUEST NO. 2:

All documents sufficient to identify the security analysts following and reporting on Navistar's stock during the Class Period.

RESPONSE:

The Navistar Defendants hereby incorporate their General Objections as and for their objections to Request No. 2. The Navistar Defendants further object to Request No. 2 as vague, ambiguous and incapable of reasonable ascertainment. The Navistar Defendants further object to Request No. 2 as overly broad and unduly burdensome. The Navistar Defendants further object to Request No. 2 to the extent it seeks information that is equally available to Lead Plaintiffs in the public domain or available from sources other than the Navistar Defendants, or that is equally available to or already in the possession, custody or control of Lead Plaintiffs or their attorneys and for which the burden on Lead Plaintiffs to obtain the information is no greater than the burden on the Navistar Defendants.

REQUEST NO. 3:

All documents or communications concerning Navistar's December 14, 2005 announcement that it had "postponed a scheduled meeting with security analysts and shareowners because the company's external audit for Fiscal 2005 is still in progress."

RESPONSE:

The Navistar Defendants hereby incorporate their General Objections as and for their objections to Request No. 3. The Navistar Defendants further object to Request No. 3 as vague, ambiguous and incapable of reasonable ascertainment. The Navistar Defendants further object to Request No. 3 as overly broad and unduly burdensome. The Navistar Defendants further object to Request No. 3 to the extent that it is premature and violates the Court's instructions provided in the Scheduling Order, dated September 10, 2009 (the "Scheduling Order"), as it involves issues which are related solely to the merits and do not bear on class certification. The Navistar Defendants further object to Request No. 3 to the extent it seeks information that is equally available to Lead Plaintiffs in the public domain or available from sources other than the Navistar Defendants, or that is equally available to or already in the possession, custody or control of Lead Plaintiffs or their attorneys and for which the burden on Lead Plaintiffs to obtain the information is no greater than the burden on the Navistar Defendants.

REQUEST NO. 4:

All documents or communications concerning reaction by the market and/or analysts regarding Navistar's December 14, 2005 announcement that it had "postponed a scheduled meeting with security analysts and shareowners because the company's external audit for Fiscal 2005 is still in progress," and the impact of the same on the price of Navistar stock.

RESPONSE:

The Navistar Defendants hereby incorporate their General Objections as and for their objections to Request No. 4. The Navistar Defendants further object to Request No. 4 as vague, ambiguous and incapable of reasonable ascertainment. The Navistar Defendants further object to Request No. 4 as overly broad and unduly burdensome. The Navistar Defendants further object to Request No. 4 to the extent it seeks information that is equally available to Lead Plaintiffs in the public domain or available from sources other than the Navistar Defendants, or that is equally available to or already in the possession, custody or control of Lead Plaintiffs or their attorneys and for which the burden on Lead Plaintiffs to obtain the information is no greater than the burden on the Navistar Defendants.

REQUEST NO. 5:

All documents or communications concerning Navistar's January 17, 2006 announcement that it would not be filing its 2005 Form 10-K by the January 17, 2006 filing deadline due to a "number of open items including some complex and technical accounting issues..."

RESPONSE:

The Navistar Defendants hereby incorporate their General Objections as and for their objections to Request No. 5. The Navistar Defendants further object to Request No. 5 as vague, ambiguous and incapable of reasonable ascertainment. The Navistar Defendants further object to Request No. 5 as overly broad and unduly burdensome. The Navistar Defendants further object to Request No. 5 to the extent that it is premature and violates the Court's instructions provided in the Scheduling Order, as it involves issues which are related solely to the merits and do not bear on class certification. The Navistar Defendants further object to Request No. 5 to the extent it seeks information that is equally available to Lead Plaintiffs in the public domain or available from sources other than the Navistar Defendants, or that is equally available to or already in the possession, custody or control of Lead Plaintiffs or their attorneys and for which the burden on Lead Plaintiffs to obtain the information is no greater than the burden on the Navistar Defendants.

REQUEST NO. 6:

All documents or communications concerning reaction by the market and/or analysts regarding Navistar's January 17, 2006 announcement that it would not be filing its 2005 Form 10-K by the January 17, 2006 filing deadline due to a "number of open items including some complex and technical accounting issues..." and the impact of the same on the price of Navistar stock.

RESPONSE:

The Navistar Defendants hereby incorporate their General Objections as and for their objections to Request No. 6. The Navistar Defendants further object to Request No. 6 as vague, ambiguous and incapable of reasonable ascertainment. The Navistar Defendants further object to Request No. 6 as overly broad and unduly burdensome. The Navistar Defendants further object to Request No. 6 to the extent it seeks information that is equally available to Lead Plaintiffs in the public domain or available from sources other than the Navistar Defendants, or that is equally available to or already in the possession, custody or control of Lead Plaintiffs or their attorneys and for which the burden on Lead Plaintiffs to obtain the information is no greater than the burden on the Navistar Defendants.

REQUEST NO. 7:

All documents or communications concerning Moody's Investors Services' January 17, 2006 statement that it would maintain its long-term ratings of Navistar, "but changed the outlook to negative from stable."

RESPONSE:

The Navistar Defendants hereby incorporate their General Objections as and for their objections to Request No. 7. The Navistar Defendants further object to Request No. 7 as vague, ambiguous and incapable of reasonable ascertainment. The Navistar Defendants further object to Request No. 7 as overly broad and unduly burdensome. The Navistar Defendants further object to Request No. 7 to the extent that it is premature and violates the Court's instructions provided in the Scheduling Order, as it involves issues which are related solely to the merits and do not bear on class certification. The Navistar Defendants further object to Request No. 7 to the extent it seeks information that is equally available to Lead Plaintiffs in the public domain or available from sources other than the Navistar Defendants, or that is equally available to or already in the possession, custody or control of Lead Plaintiffs or their attorneys and for which the burden on Lead Plaintiffs to obtain the information is no greater than the burden on the Navistar Defendants.

REQUEST NO. 8:

All documents or communications concerning reaction by the market and/or analysts regarding Moody's Investors Services' January 17, 2006 statement that it would maintain its long-term ratings of Navistar, "but changed the outlook to negative from stable," and the impact of the same on the price of Navistar stock.

RESPONSE:

The Navistar Defendants hereby incorporate their General Objections as and for their objections to Request No. 8. The Navistar Defendants further object to Request No. 8 as vague, ambiguous and incapable of reasonable ascertainment. The Navistar Defendants further object to Request No. 8 as overly broad and unduly burdensome. The Navistar Defendants further object to Request No. 8 to the extent it seeks information that is equally available to Lead Plaintiffs in the public domain or available from sources other than the Navistar Defendants, or that is equally available to or already in the possession, custody or control of Lead Plaintiffs or their attorneys and for which the burden on Lead Plaintiffs to obtain the information is no greater than the burden on the Navistar Defendants.

REQUEST NO. 9:

All documents or communications concerning Standard & Poor's Ratings Service's January 18, 2006 statement that it was placing Navistar on "CreditWatch with negative implications."

RESPONSE:

The Navistar Defendants hereby incorporate their General Objections as and for their objections to Request No. 9. The Navistar Defendants further object to Request No. 9 as vague, ambiguous and incapable of reasonable ascertainment. The Navistar Defendants further object to Request No. 9 as overly broad and unduly burdensome. The Navistar Defendants further object to Request No. 9 to the extent that it is premature and violates the Court's instructions provided in the Scheduling Order, as it involves issues which are related solely to the merits and do not bear on class certification. The Navistar Defendants further object to Request No. 9 to the extent it seeks information that is equally available to Lead Plaintiffs in the public domain or available from sources other than the Navistar Defendants, or that is equally available to or already in the possession, custody or control of Lead Plaintiffs or their attorneys and for which the burden on Lead Plaintiffs to obtain the information is no greater than the burden on the Navistar Defendants.

REQUEST NO. 10:

All documents or communications concerning reaction by the market and/or analysts regarding Standard & Poor's Ratings Service's January 18, 2006 statement that it was placing Navistar on "CreditWatch with negative implications," and the impact of the same on the price of Navistar stock.

RESPONSE:

The Navistar Defendants hereby incorporate their General Objections as and for their objections to Request No. 10. The Navistar Defendants further object to Request No. 10 as vague, ambiguous and incapable of reasonable ascertainment. The Navistar Defendants further object to Request No. 10 as overly broad and unduly burdensome. The Navistar Defendants further object to Request No. 10 to the extent it seeks information that is equally available to Lead Plaintiffs in the public domain or available from sources other than the Navistar

Defendants, or that is equally available to or already in the possession, custody or control of Lead Plaintiffs or their attorneys and for which the burden on Lead Plaintiffs to obtain the information is no greater than the burden on the Navistar Defendants.

REQUEST NO. 11:

All documents or communications concerning Fitch Ratings' January 19, 2006 statement that it had placed the debt ratings of Navistar on "Rating Watch Negative."

RESPONSE:

The Navistar Defendants hereby incorporate their General Objections as and for their objections to Request No. 11. The Navistar Defendants further object to Request No. 11 as vague, ambiguous and incapable of reasonable ascertainment. The Navistar Defendants further object to Request No. 11 as overly broad and unduly burdensome. The Navistar Defendants further object to Request No. 11 to the extent that it is premature and violates the Court's instructions provided in the Scheduling Order, as it involves issues which are related solely to the merits and do not bear on class certification. The Navistar Defendants further object to Request No. 11 to the extent it seeks information that is equally available to Lead Plaintiffs in the public domain or available from sources other than the Navistar Defendants, or that is equally available to or already in the possession, custody or control of Lead Plaintiffs or their attorneys and for which the burden on Lead Plaintiffs to obtain the information is no greater than the burden on the Navistar Defendants.

REQUEST NO. 12:

All documents or communications concerning reaction by the market and/or analysts regarding Fitch Ratings' January 19, 2006 statement that it had placed the debt ratings of Navistar on "Rating Watch Negative," and the impact of the same on the price of Navistar stock.

RESPONSE:

The Navistar Defendants hereby incorporate their General Objections as and for their objections to Request No. 12. The Navistar Defendants further object to Request No. 12 as vague, ambiguous and incapable of reasonable ascertainment. The Navistar Defendants further object to Request No. 12 as overly broad and unduly burdensome. The Navistar Defendants further object to Request No. 12 to the extent it seeks information that is equally available to Lead Plaintiffs in the public domain or available from sources other than the Navistar Defendants, or that is equally available to or already in the possession, custody or control of Lead Plaintiffs or their attorneys and for which the burden on Lead Plaintiffs to obtain the information is no greater than the burden on the Navistar Defendants.

REQUEST NO. 13:

All documents or communications concerning Navistar's February 3, 2006 filing on Form 8-K with the SEC that it was in default on its 4.75% Subordinated Exchangeable Notes due in 2009.

RESPONSE:

The Navistar Defendants hereby incorporate their General Objections as and for their objections to Request No. 13. The Navistar Defendants further object to Request No. 13 as vague, ambiguous and incapable of reasonable ascertainment. The Navistar Defendants further object to Request No. 13 as overly broad and unduly burdensome. The Navistar Defendants further object to Request No. 13 to the extent that it is premature and violates the Court's instructions provided in the Scheduling Order, as it involves issues which are related solely to the merits and do not bear on class certification. The Navistar Defendants further object to Request No. 13 to the extent it seeks information that is equally available to Lead Plaintiffs in the public domain or available from sources other than the Navistar Defendants, or that is equally available to or already in the possession, custody or control of Lead Plaintiffs or their attorneys and for which the burden on Lead Plaintiffs to obtain the information is no greater than the burden on the Navistar Defendants.

REQUEST NO. 14:

All documents or communications concerning reaction by the market and/or analysts regarding Navistar's February 3, 2006 filing on Form 8-K with the SEC that it was in default on its 4.75% Subordinated Exchangeable Notes due in 2009, and the impact of the same on the price of Navistar stock.

RESPONSE:

The Navistar Defendants hereby incorporate their General Objections as and for their objections to Request No. 14. The Navistar Defendants further object to Request No. 14 as vague, ambiguous and incapable of reasonable ascertainment. The Navistar Defendants further object to Request No. 14 as overly broad and unduly burdensome. The Navistar Defendants further object to Request No. 14 to the extent it seeks information that is equally available to Lead Plaintiffs in the public domain or available from sources other than the Navistar Defendants, or that is equally available to or already in the possession, custody or control of Lead Plaintiffs or their attorneys and for which the burden on Lead Plaintiffs to obtain the information is no greater than the burden on the Navistar Defendants.

REQUEST NO. 15:

All documents or communications concerning Navistar's February 16, 2006 press release, including the Company's announcement that Defendant Schwetschenau had "been reassigned to another position within the company."

RESPONSE:

The Navistar Defendants hereby incorporate their General Objections as and for their objections to Request No. 15. The Navistar Defendants further object to Request No. 15 as vague, ambiguous and incapable of reasonable ascertainment. The Navistar Defendants further

object to Request No. 15 as overly broad and unduly burdensome. The Navistar Defendants further object to Request No. 15 to the extent that it is premature and violates the Court's instructions provided in the Scheduling Order, as it involves issues which are related solely to the merits and do not bear on class certification. The Navistar Defendants further object to Request No. 15 to the extent it seeks information that is equally available to Lead Plaintiffs in the public domain or available from sources other than the Navistar Defendants, or that is equally available to or already in the possession, custody or control of Lead Plaintiffs or their attorneys and for which the burden on Lead Plaintiffs to obtain the information is no greater than the burden on the Navistar Defendants.

REQUEST NO. 16:

All documents or communications concerning reaction by the market and/or analysts regarding Navistar's February 16, 2006 press release, including the Company's announcement that Defendant Schwetschenau had "been reassigned to another position within the company," and the impact of the same on the price of Navistar stock.

RESPONSE:

The Navistar Defendants hereby incorporate their General Objections as and for their objections to Request No. 16. The Navistar Defendants further object to Request No. 16 as vague, ambiguous and incapable of reasonable ascertainment. The Navistar Defendants further object to Request No. 16 as overly broad and unduly burdensome. The Navistar Defendants further object to Request No. 16 to the extent it seeks information that is equally available to Lead Plaintiffs in the public domain or available from sources other than the Navistar Defendants, or that is equally available to or already in the possession, custody or control of Lead Plaintiffs or their attorneys and for which the burden on Lead Plaintiffs to obtain the information is no greater than the burden on the Navistar Defendants.

REQUEST NO. 17:

All documents or communications concerning Navistar's February 21, 2006 press release, including the Company's announcement that Navistar's "review of the accounting matters may result in changes to its previously issued financial statements, including the possibility of a restatement."

RESPONSE:

The Navistar Defendants hereby incorporate their General Objections as and for their objections to Request No. 17. The Navistar Defendants further object to Request No. 17 as vague, ambiguous and incapable of reasonable ascertainment. The Navistar Defendants further object to Request No. 17 as overly broad and unduly burdensome. The Navistar Defendants further object to Request No. 17 to the extent that it is premature and violates the Court's instructions provided in the Scheduling Order, as it involves issues which are related solely to the merits and do not bear on class certification. The Navistar Defendants further object to Request No. 17 to the extent it seeks information that is equally available to Lead Plaintiffs in the public domain or available from sources other than the Navistar Defendants, or that is equally available to or already in the possession, custody or control of Lead Plaintiffs or their attorneys and for which the burden on Lead Plaintiffs to obtain the information is no greater than the burden on the Navistar Defendants.

REQUEST NO. 18:

All documents or communications concerning reaction by the market and/or analysts regarding Navistar's February 21, 2006 press release, including the Company's announcement that Navistar's "review of the accounting matters may result in changes to its previously issued financial statements, including the possibility of a restatement," and the impact of the same on the price of Navistar stock.

RESPONSE:

The Navistar Defendants hereby incorporate their General Objections as and for their objections to Request No. 18. The Navistar Defendants further object to Request No. 18 as vague, ambiguous and incapable of reasonable ascertainment. The Navistar Defendants further object to Request No. 18 as overly broad and unduly burdensome. The Navistar Defendants further object to Request No. 18 to the extent it seeks information that is equally available to Lead Plaintiffs in the public domain or available from sources other than the Navistar Defendants, or that is equally available to or already in the possession, custody or control of Lead Plaintiffs or their attorneys and for which the burden on Lead Plaintiffs to obtain the information is no greater than the burden on the Navistar Defendants.

REQUEST NO. 19:

All documents or communications concerning Navistar's March 17, 2006 filing with the SEC on Form NT 1O-Q Notice of Late Filing that it would not file its Form 10-Q for the quarter ended January 31, 2006 by the March 17, 2006 deadline.

RESPONSE:

The Navistar Defendants hereby incorporate their General Objections as and for their objections to Request No. 19. The Navistar Defendants further object to Request No. 19 as vague, ambiguous and incapable of reasonable ascertainment. The Navistar Defendants further object to Request No. 19 as overly broad and unduly burdensome. The Navistar Defendants further object to Request No. 19 to the extent that it is premature and violates the Court's instructions provided in the Scheduling Order, as it involves issues which are related solely to the merits and do not bear on class certification. The Navistar Defendants further object to Request No. 19 to the extent it seeks information that is equally available to Lead Plaintiffs in the public domain or available from sources other than the Navistar Defendants, or that is equally available to or already in the possession, custody or control of Lead Plaintiffs or their attorneys and for which the burden on Lead Plaintiffs to obtain the information is no greater than the burden on the Navistar Defendants.

REQUEST NO. 20:

All documents or communications concerning reaction by the market and/or analysts regarding Navistar's March 17, 2006 filing with the SEC on Form NT 10-Q Notice of Late Filing that it would not file its Form 10-Q for the quarter ended January 31, 2006 by the March 17, 2006 deadline, and the impact of the same on the price of Navistar stock.

RESPONSE:

The Navistar Defendants hereby incorporate their General Objections as and for their objections to Request No. 20. The Navistar Defendants further object to Request No. 20 as vague, ambiguous and incapable of reasonable ascertainment. The Navistar Defendants further object to Request No. 20 as overly broad and unduly burdensome. The Navistar Defendants further object to Request No. 20 to the extent it seeks information that is equally available to Lead Plaintiffs in the public domain or available from sources other than the Navistar Defendants, or that is equally available to or already in the possession, custody or control of Lead Plaintiffs or their attorneys and for which the burden on Lead Plaintiffs to obtain the information is no greater than the burden on the Navistar Defendants.

REQUEST NO. 21:

All documents or communications concerning Navistar's April 7, 2006 announcement that it would be restating its financial results for the fiscal years 2002 through 2004 and the first three quarters of 2005, that it was replacing its outside auditor, and that Defendant Schwetschenau had been reassigned because auditor Deloitte & Touche had informed the Company's Audit Committee that it "was no longer willing to rely on the representations of the former Controller."

RESPONSE:

The Navistar Defendants hereby incorporate their General Objections as and for their objections to Request No. 21. The Navistar Defendants further object to Request No. 21 as vague, ambiguous and incapable of reasonable ascertainment. The Navistar Defendants further object to Request No. 21 as overly broad and unduly burdensome. The Navistar Defendants further object to Request No. 21 to the extent that it is premature and violates the Court's instructions provided in the Scheduling Order, as it involves issues which are related solely to the merits and do not bear on class certification. The Navistar Defendants further object to Request No. 21 to the extent it seeks information that is equally available to Lead Plaintiffs in the public domain or available from sources other than the Navistar Defendants, or that is equally available to or already in the possession, custody or control of Lead Plaintiffs or their attorneys and for which the burden on Lead Plaintiffs to obtain the information is no greater than the burden on the Navistar Defendants.

REQUEST NO. 22:

All documents or communications concerning reaction by the market and/or analysts regarding Navistar's April 7, 2006 announcement that it would be restating its financial results for the fiscal years 2002 through 2004 and the first three quarters of 2005, that it was replacing its outside auditor, and that Defendant Schwetschenau had been reassigned because auditor Deloitte & Touche had informed the Company's Audit Committee that it "was no longer willing to rely on the representations of the former Controller," and the impact of the same on the price of Navistar stock.

RESPONSE:

The Navistar Defendants hereby incorporate their General Objections as and for their objections to Request No. 22. The Navistar Defendants further object to Request No. 22 as vague, ambiguous and incapable of reasonable ascertainment. The Navistar Defendants further object to Request No. 22 as overly broad and unduly burdensome. The Navistar Defendants further object to Request No. 22 to the extent it seeks information that is equally available to Lead Plaintiffs in the public domain or available from sources other than the Navistar Defendants, or that is equally available to or already in the possession, custody or control of Lead Plaintiffs or their attorneys and for which the burden on Lead Plaintiffs to obtain the information is no greater than the burden on the Navistar Defendants.

REQUEST NO. 23:

All documents or communications concerning Navistar's April 12, 2006 filing with the SEC on Form 8-K, including those matters set forth in paragraphs 260-262 of the Complaint.

RESPONSE:

The Navistar Defendants hereby incorporate their General Objections as and for their objections to Request No. 23. The Navistar Defendants further object to Request No. 23 as vague, ambiguous and incapable of reasonable ascertainment. The Navistar Defendants further object to Request No. 23 as overly broad and unduly burdensome. The Navistar Defendants further object to Request No. 23 to the extent that it is premature and violates the Court's instructions provided in the Scheduling Order, as it involves issues which are related solely to the merits and do not bear on class certification. The Navistar Defendants further object to Request No. 23 to the extent it seeks information that is equally available to Lead Plaintiffs in the public domain or available from sources other than the Navistar Defendants, or that is equally available to or already in the possession, custody or control of Lead Plaintiffs or their attorneys and for which the burden on Lead Plaintiffs to obtain the information is no greater than the burden on the Navistar Defendants.

REQUEST NO. 24:

All documents or communications concerning reaction by the market and/or analysts regarding Navistar's April 12, 2006 filing with the SEC on Form 8-K, and the impact of the same on the price of Navistar stock.

RESPONSE:

The Navistar Defendants hereby incorporate their General Objections as and for their objections to Request No. 24. The Navistar Defendants further object to Request No. 24 as vague, ambiguous and incapable of reasonable ascertainment. The Navistar Defendants further object to Request No. 24 as overly broad and unduly burdensome. The Navistar Defendants further object to Request No. 24 to the extent it seeks information that is equally available to Lead Plaintiffs in the public domain or available from sources other than the Navistar Defendants, or that is equally available to or already in the possession, custody or control of Lead Plaintiffs or their attorneys and for which the burden on Lead Plaintiffs to obtain the information is no greater than the burden on the Navistar Defendants.

REQUEST NO. 25:

All documents or communications concerning Navistar's April 28, 2006 filing with the SEC on Form 8-K/A, including those matters set forth in paragraphs 263-265 of the Complaint.

RESPONSE:

The Navistar Defendants hereby incorporate their General Objections as and for their objections to Request No. 25. The Navistar Defendants further object to Request No. 25 as vague, ambiguous and incapable of reasonable ascertainment. The Navistar Defendants further object to Request No. 25 as overly broad and unduly burdensome. The Navistar Defendants further object to Request No. 25 to the extent that it is premature and violates the Court's instructions provided in the Scheduling Order, as it involves issues which are related solely to the merits and do not bear on class certification. The Navistar Defendants further object to Request No. 25 to the extent it seeks information that is equally available to Lead Plaintiffs in the public domain or available from sources other than the Navistar Defendants, or that is equally available to or already in the possession, custody or control of Lead Plaintiffs or their attorneys and for which the burden on Lead Plaintiffs to obtain the information is no greater than the burden on the Navistar Defendants.

REQUEST NO. 26:

All documents or communications concerning reaction by the market and/or analysts regarding Navistar's April 28, 2006 filing with the SEC on Form 8-K/A, and the impact of the same on the price of Navistar stock.

RESPONSE:

The Navistar Defendants hereby incorporate their General Objections as and for their objections to Request No. 26. The Navistar Defendants further object to Request No. 26 as vague, ambiguous and incapable of reasonable ascertainment. The Navistar Defendants further object to Request No. 26 as overly broad and unduly burdensome. The Navistar Defendants further object to Request No. 26 to the extent it seeks information that is equally available to Lead Plaintiffs in the public domain or available from sources other than the Navistar Defendants, or that is equally available to or already in the possession, custody or control of Lead Plaintiffs or their attorneys and for which the burden on Lead Plaintiffs to obtain the information is no greater than the burden on the Navistar Defendants.

REQUEST NO. 27:

All documents or communications concerning Navistar's May 10, 2006 press release informing investors that the Company expected its earnings for fiscal 2006 to "be higher than the current average estimate of Wall Street analysts of $5.38 per share."

RESPONSE:

The Navistar Defendants hereby incorporate their General Objections as and for their objections to Request No. 27. The Navistar Defendants further object to Request No. 27 as vague, ambiguous and incapable of reasonable ascertainment. The Navistar Defendants further object to Request No. 27 as overly broad and unduly burdensome. The Navistar Defendants further object to Request No. 27 to the extent that it is premature and violates the Court's instructions provided in the Scheduling Order, as it involves issues which are related solely to the merits and do not bear on class certification. The Navistar Defendants further object to Request No. 27 to the extent it seeks information that is equally available to Lead Plaintiffs in the public domain or available from sources other than the Navistar Defendants, or that is equally available to or already in the possession, custody or control of Lead Plaintiffs or their attorneys and for which the burden on Lead Plaintiffs to obtain the information is no greater than the burden on the Navistar Defendants.

REQUEST NO. 28:

All documents or communications concerning reaction by the market and/or analysts regarding Navistar's May 10, 2006 press release informing investors that the Company expected its earnings for fiscal 2006 to "be higher than the current average estimate of Wall Street analysts of $5.38 per share," and the impact of the same on the price of Navistar stock.

RESPONSE:

The Navistar Defendants hereby incorporate their General Objections as and for their objections to Request No. 28. The Navistar Defendants further object to Request No. 28 as vague, ambiguous and incapable of reasonable ascertainment. The Navistar Defendants further object to Request No. 28 as overly broad and unduly burdensome. The Navistar Defendants further object to Request No. 28 to the extent it seeks information that is equally available to Lead Plaintiffs in the public domain or available from sources other than the Navistar Defendants, or that is equally available to or already in the possession, custody or control of Lead Plaintiffs or their attorneys and for which the burden on Lead Plaintiffs to obtain the information is no greater than the burden on the Navistar Defendants.

REQUEST NO. 29:

All documents or communications concerning Bear Stearns analyst Peter Nesvold's May 30, 2006 report on Navistar.

RESPONSE:

The Navistar Defendants hereby incorporate their General Objections as and for their objections to Request No. 29. The Navistar Defendants further object to Request No. 29 as vague, ambiguous and incapable of reasonable ascertainment. The Navistar Defendants further

object to Request No. 29 as overly broad and unduly burdensome. The Navistar Defendants further object to Request No. 29 to the extent that it is premature and violates the Court's instructions provided in the Scheduling Order, as it involves issues which are related solely to the merits and do not bear on class certification. The Navistar Defendants further object to Request No. 29 to the extent it seeks information that is equally available to Lead Plaintiffs in the public domain or available from sources other than the Navistar Defendants, or that is equally available to or already in the possession, custody or control of Lead Plaintiffs or their attorneys and for which the burden on Lead Plaintiffs to obtain the information is no greater than the burden on the Navistar Defendants.

REQUEST NO. 30:

All documents or communications concerning reaction by the market and/or analysts regarding Bear Stearns analyst Peter Nesvold's May 30, 2006 report on Navistar, and the impact of the same on the price of Navistar stock.

RESPONSE:

The Navistar Defendants hereby incorporate their General Objections as and for their objections to Request No. 30. The Navistar Defendants further object to Request No. 30 as vague, ambiguous and incapable of reasonable ascertainment. The Navistar Defendants further object to Request No. 30 as overly broad and unduly burdensome. The Navistar Defendants further object to Request No. 30 to the extent it seeks information that is equally available to Lead Plaintiffs in the public domain or available from sources other than the Navistar Defendants, or that is equally available to or already in the possession, custody or control of Lead Plaintiffs or their attorneys and for which the burden on Lead Plaintiffs to obtain the information is no greater than the burden on the Navistar Defendants.

REQUEST NO. 31:

All documents or communications concerning Navistar's June 2, 2006 press release announcing the Company's plan to file its Fiscal 2006 Form 10-K by mid-January 2007.

RESPONSE:

The Navistar Defendants hereby incorporate their General Objections as and for their objections to Request No. 31. The Navistar Defendants further object to Request No. 31 as vague, ambiguous and incapable of reasonable ascertainment. The Navistar Defendants further object to Request No. 31 as overly broad and unduly burdensome. The Navistar Defendants further object to Request No. 31 to the extent that it is premature and violates the Court's instructions provided in the Scheduling Order, as it involves issues which are related solely to the merits and do not bear on class certification. The Navistar Defendants further object to Request No. 31 to the extent it seeks information that is equally available to Lead Plaintiffs in the public domain or available from sources other than the Navistar Defendants, or that is equally available to or already in the possession, custody or control of Lead Plaintiffs or their attorneys and for which the burden on Lead Plaintiffs to obtain the information is no greater than the burden on the Navistar Defendants.

REQUEST NO. 32:

All documents or communications concerning reaction by the market and/or analysts regarding Navistar's June 2, 2006 press release announcing the Company's plan to file its Fiscal 2006 Form 10-K by mid-January 2007, and the impact of the same on the price of Navistar stock.

RESPONSE:

The Navistar Defendants hereby incorporate their General Objections as and for their objections to Request No. 32. The Navistar Defendants further object to Request No. 32 as vague, ambiguous and incapable of reasonable ascertainment. The Navistar Defendants further

object to Request No. 32 as overly broad and unduly burdensome. The Navistar Defendants further object to Request No. 32 to the extent it seeks information that is equally available to Lead Plaintiffs in the public domain or available from sources other than the Navistar Defendants, or that is equally available to or already in the possession, custody or control of Lead Plaintiffs or their attorneys and for which the burden on Lead Plaintiffs to obtain the information is no greater than the burden on the Navistar Defendants.

REQUEST NO. 33:

All documents or communications concerning Navistar's June 7, 2006 conference call with investors to discuss its financial results for the first six months of fiscal 2006.

RESPONSE:

The Navistar Defendants hereby incorporate their General Objections as and for their objections to Request No. 33. The Navistar Defendants further object to Request No. 33 as vague, ambiguous and incapable of reasonable ascertainment. The Navistar Defendants further object to Request No. 33 as overly broad and unduly burdensome. The Navistar Defendants further object to Request No. 33 to the extent that it is premature and violates the Court's instructions provided in the Scheduling Order, as it involves issues which are related solely to the merits and do not bear on class certification. The Navistar Defendants further object to Request No. 33 to the extent it seeks information that is equally available to Lead Plaintiffs in the public domain or available from sources other than the Navistar Defendants, or that is equally available to or already in the possession, custody or control of Lead Plaintiffs or their attorneys and for which the burden on Lead Plaintiffs to obtain the information is no greater than the burden on the Navistar Defendants.

REQUEST NO. 34:

All documents or communications concerning reaction by the market and/or analysts regarding Navistar's June 7, 2006 conference call with investors to discuss its financial results for the first six months of fiscal 2006, and the impact of the same on the price of Navistar stock.

RESPONSE:

The Navistar Defendants hereby incorporate their General Objections as and for their objections to Request No. 34. The Navistar Defendants further object to Request No. 34 as vague, ambiguous and incapable of reasonable ascertainment. The Navistar Defendants further object to Request No. 34 as overly broad and unduly burdensome. The Navistar Defendants further object to Request No. 34 to the extent it seeks information that is equally available to Lead Plaintiffs in the public domain or available from sources other than the Navistar Defendants, or that is equally available to or already in the possession, custody or control of Lead Plaintiffs or their attorneys and for which the burden on Lead Plaintiffs to obtain the information is no greater than the burden on the Navistar Defendants.

REQUEST NO. 35:

All documents or communications regarding Moody's Investor Services' July 17, 2006 press release announcing its withdrawal of ratings of Navistar's B1 senior unsecured and B3 subordinate notes.

RESPONSE:

The Navistar Defendants hereby incorporate their General Objections as and for their objections to Request No. 35. The Navistar Defendants further object to Request No. 35 as vague, ambiguous and incapable of reasonable ascertainment. The Navistar Defendants further object to Request No. 35 as overly broad and unduly burdensome. The Navistar Defendants further object to Request No. 35 to the extent that it is premature and violates the Court's instructions provided in the Scheduling Order, as it involves issues which are related solely to the merits and do not bear on class certification. The Navistar Defendants further object to Request No. 35 to the extent it seeks information that is equally available to Lead Plaintiffs in the public domain or available from sources other than the Navistar Defendants, or that is equally available to or already in the possession, custody or control of Lead Plaintiffs or their attorneys and for which the burden on Lead Plaintiffs to obtain the information is no greater than the burden on the Navistar Defendants.

REQUEST NO. 36:

All documents or communications concerning reaction by the market and/or analysts regarding Moody's Investor Service's July 17, 2006 press release announcing its withdrawal of ratings of Navistar's B1 senior unsecured and B3 subordinate notes, and the impact of the same on the price of Navistar stock.

RESPONSE:

The Navistar Defendants hereby incorporate their General Objections as and for their objections to Request No. 36. The Navistar Defendants further object to Request No. 36 as vague, ambiguous and incapable of reasonable ascertainment. The Navistar Defendants further object to Request No. 36 as overly broad and unduly burdensome. The Navistar Defendants further object to Request No. 36 to the extent it seeks information that is equally available to Lead Plaintiffs in the public domain or available from sources other than the Navistar Defendants, or that is equally available to or already in the possession, custody or control of Lead Plaintiffs or their attorneys and for which the burden on Lead Plaintiffs to obtain the information is no greater than the burden on the Navistar Defendants.

REQUEST NO. 37:

All documents produced to the SEC in connection with any investigations, formal or informal, related to Navistar's restatement of its financial results for fiscal years 2002 through 2004 and the first three quarters of 2005.

RESPONSE:

The Navistar Defendants hereby incorporate their General Objections as and for their objections to Request No. 37. The Navistar Defendants further object to Request No. 37 as overly broad and not reasonably tailored to seek information and documents that are relevant and/or calculated to lead to the discovery of admissible evidence. It is Lead Plaintiffs' obligation to identify and request specific categories of documents that are relevant and discoverable in this action. The Navistar Defendants further object to Request No. 37 to the extent that it seeks information not reasonably limited in time or scope or to the relevant time period in question, and/or would require undue expense to respond. The Navistar Defendants further object to Request No. 37 to the extent that it is premature and violates the Court's instructions provided in the Scheduling Order, as it involves issues which are related solely to the merits and do not bear on class certification.

REQUEST NO. 38:

All documents or communications concerning the SEC investigation referenced in Request 37.

RESPONSE:

The Navistar Defendants hereby incorporate their General Objections as and for their objections to Request No. 38. The Navistar Defendants further object to Request No. 38 as overly broad and not reasonably tailored to seek information and documents that are relevant and/or calculated to lead to the discovery of admissible evidence. It is Lead Plaintiffs' obligation to identify and request specific categories of documents that are relevant and discoverable in this action. The Navistar Defendants further object to Request No. 38 to the extent that it seeks information not reasonably limited in time or scope or to the relevant time period in question, and/or would require undue expense to respond. The Navistar Defendants further object to

Request No. 38 to the extent that it is premature and violates the Court's instructions provided in the Scheduling Order, as it involves issues which are related solely to the merits and do not bear on class certification.

REQUEST NO. 39:

All documents concerning any 10b5-1 trading plan entered into by Ustian, including documents regarding the creation of the plan and all trading of Navistar stock pursuant to that plan.

RESPONSE:

The Navistar Defendants hereby incorporate their General Objections as and for their objections to Request No. 39. The Navistar Defendants further object to Request No. 39 to the extent that it is premature and violates the Court's instructions provided in the Scheduling Order, as it involves issues which are related solely to the merits and do not bear on class certification. The Navistar Defendants further object to Request No. 39 to the extent it seeks information that is equally available to Lead Plaintiffs in the public domain or available from sources other than the Navistar Defendants, or that is equally available to or already in the possession, custody or control of Lead Plaintiffs or their attorneys and for which the burden on Lead Plaintiffs to obtain the information is no greater than the burden on the Navistar Defendants.

REQUEST NO. 40:

All documents concerning any 10b5-1 trading plan entered into by Lannert, including documents regarding the creation of the plan and all trading of Navistar stock pursuant to that plan.

RESPONSE:

The Navistar Defendants hereby incorporate their General Objections as and for their objections to Request No. 40. The Navistar Defendants further object to Request No. 40 to the extent that it is premature and violates the Court's instructions provided in the Scheduling Order, as it involves issues which are related solely to the merits and do not bear on class certification. The Navistar Defendants further object to Request No. 40 to the extent it seeks information that is equally available to Lead Plaintiffs in the public domain or available from sources other than the Navistar Defendants, or that is equally available to or already in the possession, custody or control of Lead Plaintiffs or their attorneys and for which the burden on Lead Plaintiffs to obtain the information is no greater than the burden on the Navistar Defendants.

REQUEST NO. 41:

All documents concerning any 10b5-1 trading plan entered into by Schwetschenau, including documents regarding the creation of the plan and all trading of Navistar stock pursuant to that plan.

RESPONSE:

The Navistar Defendants hereby incorporate their General Objections as and for their objections to Request No. 41. The Navistar Defendants further object to Request No. 41 to the extent that it is premature and violates the Court's instructions provided in the Scheduling Order, as it involves issues which are related solely to the merits and do not bear on class certification. The Navistar Defendants further object to Request No. 41 to the extent it seeks information that is equally available to Lead Plaintiffs in the public domain or available from sources other than the Navistar Defendants, or that is equally available to or already in the possession, custody or control of Lead Plaintiffs or their attorneys and for which the burden on Lead Plaintiffs to obtain the information is no greater than the burden on the Navistar Defendants.

REQUEST NO. 42:

All minutes (with all exhibits, attachments, agenda or other documents) of all meetings of Navistar's Board of Directors or any committee or subcommittee thereof.

RESPONSE:

The Navistar Defendants hereby incorporate their General Objections as and for their objections to Request No. 42. The Navistar Defendants further object to Request No. 42 as overly broad and not reasonably tailored to seek information and documents that are relevant and/or calculated to lead to the discovery of admissible evidence. It is Lead Plaintiffs' obligation to identify and request specific categories of documents that are relevant and discoverable in this action. The Navistar Defendants further object to Request No. 42 to the extent that it is premature and violates the Court's instructions provided in the Scheduling Order, as it involves issues which are related solely to the merits and do not bear on class certification.

REQUEST NO. 43:

Corporate organizational charts that identify or depict the structure of Navistar and its divisions, affiliates, parents, subsidiaries and/or business segments.

RESPONSE:

The Navistar Defendants hereby incorporate their General Objections as and for their objections to Request No. 43. The Navistar Defendants further object to Request No. 43 to the extent that it is premature and violates the Court's instructions provided in the Scheduling Order, as it involves issues which are related solely to the merits and do not bear on class certification.

REQUEST NO. 44:

Corporate organizational charts that identify or depict the reporting structure for employees of Navistar and its divisions, affiliates, parents, subsidiaries and/or business segments.

RESPONSE:

The Navistar Defendants hereby incorporate their General Objections as and for their objections to Request No. 44. The Navistar Defendants further object to Request No. 44 to the extent that it is premature and violates the Court's instructions provided in the Scheduling Order, as it involves issues which are related solely to the merits and do not bear on class certification. Subject to and without waiving the foregoing instructions, the Navistar Defendants will produce non-privileged documents sufficient to show Navistar's corporate structure and organization.

REQUEST NO. 45:

All documents from which the number and/or identity of Navistar shareholders can be determined.

RESPONSE:

The Navistar Defendants hereby incorporate their General Objections as and for their objections to Request No. 45. The Navistar Defendants further object to Request No. 45 as overly broad and unduly burdensome. The Navistar Defendants further object to Request No. 45 to the extent it seeks information that is equally available to Lead Plaintiffs in the public domain or available from sources other than the Navistar Defendants, or that is equally available to or already in the possession, custody or control of Lead Plaintiffs or their attorneys and for which the burden on Lead Plaintiffs to obtain the information is no greater than the burden on the Navistar Defendants. Subject to and without waiving the foregoing instructions, the Navistar Defendants will produce non-privileged documents sufficient to provide a list of Navistar's registered stockholders.

REQUEST NO. 46:

All documents concerning the number of shares of Navistar common stock which were issued and outstanding.

RESPONSE:

The Navistar Defendants hereby incorporate their General Objections as and for their objections to Request No. 46. The Navistar Defendants further object to Request No. 46 as overly broad and unduly burdensome. The Navistar Defendants further object to Request No. 46

to the extent it seeks information that is equally available to Lead Plaintiffs in the public domain or available from sources other than the Navistar Defendants, or that is equally available to or already in the possession, custody or control of Lead Plaintiffs or their attorneys and for which the burden on Lead Plaintiffs to obtain the information is no greater than the burden on the Navistar Defendants.

REQUEST NO. 47:

All documents concerning the volume of shares of Navistar common stock traded, including the daily volume of Navistar stock traded on the applicable stock market or exchange.

RESPONSE:

The Navistar Defendants hereby incorporate their General Objections as and for their objections to Request No. 47. The Navistar Defendants further object to Request No. 47 as vague, ambiguous and incapable of reasonable ascertainment. The Navistar Defendants further object to Request No. 47 as overly broad and unduly burdensome. The Navistar Defendants further object to Request No. 47 to the extent it seeks information that is equally available to Lead Plaintiffs in the public domain or available from sources other than the Navistar Defendants, or that is equally available to or already in the possession, custody or control of Lead Plaintiffs or their attorneys and for which the burden on Lead Plaintiffs to obtain the information is no greater than the burden on the Navistar Defendants.

REQUEST NO. 48:

All documents concerning any investor or security analyst meetings held by Navistar, including lists of attendees, presentations, distributed materials, and all agendas, transcripts, recordings, and minutes of all such meetings.

RESPONSE:

The Navistar Defendants hereby incorporate their General Objections as and for their objections to Request No. 48. The Navistar Defendants further object to Request No. 48 as vague, ambiguous and incapable of reasonable ascertainment. The Navistar Defendants further object to Request No. 48 as overly broad and unduly burdensome. The Navistar Defendants further object to Request No. 48 to the extent that it is premature and violates the Court's instructions provided in the Scheduling Order, as it involves issues which are related solely to the merits and do not bear on class certification. The Navistar Defendants further object to Request No. 48 to the extent it seeks information that is equally available to Lead Plaintiffs in the public domain or available from sources other than the Navistar Defendants, or that is equally available to or already in the possession, custody or control of Lead Plaintiffs or their attorneys and for which the burden on Lead Plaintiffs to obtain the information is no greater than the burden on the Navistar Defendants.

REQUEST NO. 49:

All documents concerning Navistar's expectation to meet, exceed, or miss estimates of Navistar's earnings per share or common stock price made by any money manager, financial or securities analyst, market maker, investment banker, brokerage firm, shareholder, investor, investment firm, securities firm, underwriter, financial or investment advisor, securities rating service, business subscription or wire service, financial or other publication, news service, journalist or representative of the media.

RESPONSE:

The Navistar Defendants hereby incorporate their General Objections as and for their objections to Request No. 49. The Navistar Defendants further object to Request No. 49 as vague, ambiguous and incapable of reasonable ascertainment. The Navistar Defendants further object to Request No. 49 as overly broad and unduly burdensome. The Navistar Defendants further object to Request No. 49 to the extent that it is premature and violates the Court's instructions provided in the Scheduling Order, as it involves issues which are related solely to the merits and do not bear on class certification. The Navistar Defendants further object to Request No. 49 to the extent it seeks information that is equally available to Lead Plaintiffs in the public domain or available from sources other than the Navistar Defendants, or that is equally available to or already in the possession, custody or control of Lead Plaintiffs or their attorneys and for which the burden on Lead Plaintiffs to obtain the information is no greater than the burden on the Navistar Defendants.

REQUEST NO. 50:

All documents concerning any appraisals, analyses, opinions, reviews, financial statements or other documents concerning the financial results, value, market value, fair or inherent value of either the common stock, assets, segments, or business of Navistar.

RESPONSE:

The Navistar Defendants hereby incorporate their General Objections as and for their objections to Request No. 50. The Navistar Defendants further object to Request No. 50 as vague, ambiguous and incapable of reasonable ascertainment. The Navistar Defendants further object to Request No. 50 as overly broad and unduly burdensome. The Navistar Defendants further object to Request No. 50 to the extent that it is premature and violates the Court's instructions provided in the Scheduling Order, as it involves issues which are related solely to the merits and do not bear on class certification. The Navistar Defendants further object to Request No. 50 to the extent it seeks information that is equally available to Lead Plaintiffs in the public domain or available from sources other than the Navistar Defendants, or that is equally available to or already in the possession, custody or control of Lead Plaintiffs or their attorneys and for which the burden on Lead Plaintiffs to obtain the information is no greater than the burden on the Navistar Defendants.

REQUEST NO. 51:

All communications, and all documents concerning communications, between Defendants and the SEC or the New York Stock Exchange relating to the price movement of Navistar securities.

RESPONSE:

The Navistar Defendants hereby incorporate their General Objections as and for their objections to Request No. 51. The Navistar Defendants further object to Request No. 51 as vague, ambiguous and incapable of reasonable ascertainment. The Navistar Defendants further object to Request No. 51 as overly broad and unduly burdensome. The Navistar Defendants further object to Request No. 51 to the extent that it is premature and violates the Court's instructions provided in the Scheduling Order, as it involves issues which are related solely to the merits and do not bear on class certification. The Navistar Defendants further object to Request No. 51 to the extent it seeks information that is equally available to Lead Plaintiffs in the public domain or available from sources other than the Navistar Defendants, or that is equally available to or already in the possession, custody or control of Lead Plaintiffs or their attorneys and for which the burden on Lead Plaintiffs to obtain the information is no greater than the burden on the Navistar Defendants.

REQUEST NO. 52:

All communications, and all documents concerning communications, between Defendants and any securities analyst, investment bank, investor group, or rating agency (including Moody's, Standard & Poors and Fitch).

RESPONSE:

The Navistar Defendants hereby incorporate their General Objections as and for their objections to Request No. 52. The Navistar Defendants further object to Request No. 52 as vague, ambiguous and incapable of reasonable ascertainment. The Navistar Defendants further object to Request No. 52 as overly broad and unduly burdensome. The Navistar Defendants further object to Request No. 52 to the extent that it is premature and violates the Court's instructions provided in the Scheduling Order, as it involves issues which are related solely to the merits and do not bear on class certification. The Navistar Defendants further object to Request No. 52 to the extent it seeks information that is equally available to Lead Plaintiffs in the public domain or available from sources other than the Navistar Defendants, or that is equally available to or already in the possession, custody or control of Lead Plaintiffs or their attorneys and for which the burden on Lead Plaintiffs to obtain the information is no greater than the burden on the Navistar Defendants.

REQUEST NO. 53:

All documents concerning Navistar's policies or procedures concerning the retention or destruction of documents, including the retention of electronic communications.

RESPONSE:

The Navistar Defendants hereby incorporate their General Objections as and for their objections to Request No. 53. The Navistar Defendants further object to Request No. 53 as vague, ambiguous and incapable of reasonable ascertainment. The Navistar Defendants further object to Request No. 53 as overly broad and unduly burdensome. Subject to and without waiving the foregoing objections, the Navistar Defendants state that they will produce non-privileged, responsive documents and information in their possession and control that are located through a reasonable search to the extent such documents have not been previously produced by the Navistar Defendants.

REQUEST NO. 54:

All witness statements, declarations, or affidavits received or prepared in conjunction with this litigation.

RESPONSE:

The Navistar Defendants hereby incorporate their General Objections as and for their objections to Request No. 54. The Navistar Defendants further object to Request No. 54 to the extent that it is premature and violates the Court's instructions provided in the Scheduling Order, as it involves issues which are related solely to the merits and do not bear on class certification. Subject to and without waiving the foregoing objections, the Navistar Defendants state that, at an appropriate future date, if required, they will produce non-privileged, responsive documents and information in their possession and control that are located through a reasonable search to the extent such documents have not been previously produced by the Navistar Defendants.

REQUEST NO. 55:

All documents which you in any way intend to use to support your arguments in opposition to class certification under Federal Rule of Civil Procedure 23 in this action.

RESPONSE:

The Navistar Defendants hereby incorporate their General Objections as and for their objections to Request No. 55. The Navistar Defendants further object to Request No. 55 as vague, ambiguous and incapable of reasonable ascertainment. The Navistar Defendants further object to Request No. 52 to the extent it seeks information that is equally available to Lead Plaintiffs in the public domain or available from sources other than the Navistar Defendants, or that is equally available to or already in the possession, custody or control of Lead Plaintiffs or their attorneys and for which the burden on Lead Plaintiffs to obtain the information is no greater than the burden on the Navistar Defendants. Subject to and without waiving the foregoing objections, the Navistar Defendants state that they will produce non-privileged, responsive documents and information in their possession and control that are not subject to any work product protections and that are located through a reasonable search to the extent such documents have not been previously produced by the Navistar Defendants.

REQUEST NO. 56:

All documents or communications concerning the reasons for any increase or decline in the price of Navistar stock during the Class Period.

RESPONSE:

The Navistar Defendants hereby incorporate their General Objections as and for their objections to Request No. 56. The Navistar Defendants further object to Request No. 56 as vague, ambiguous and incapable of reasonable ascertainment. The Navistar Defendants further object to Request No. 56 to the extent that it involves issues that are more appropriate for expert testimony. The Navistar Defendants further object to Request No. 56 to the extent it seeks information that is equally available to Lead Plaintiffs in the public domain or available from sources other than the Navistar Defendants, or that is equally available to or already in the possession, custody or control of Lead Plaintiffs or their attorneys and for which the burden on Lead Plaintiffs to obtain the information is no greater than the burden on the Navistar Defendants.

REQUEST NO. 57:

All documents concerning any meetings by, among, or between Navistar employees where the actual or proffered reasons for any increase or decline in the price of Navistar stock during the Class Period were discussed.

RESPONSE:

The Navistar Defendants hereby incorporate their General Objections as and for their objections to Request No. 57. The Navistar Defendants further object to Request No. 57 as vague, ambiguous and incapable of reasonable ascertainment. The Navistar Defendants further object to Request No. 57 as overly broad and unduly burdensome. The Navistar Defendants further object to Request No. 57 to the extent that it is premature and violates the Court's instructions provided in the Scheduling Order, as it involves issues which are related solely to the merits and do not bear on class certification.

REQUEST NO. 58:

All documents that provide the factual basis for each defendant's affirmative defenses.

RESPONSE:

The Navistar Defendants hereby incorporate their General Objections as and for their objections to Request No. 58. The Navistar Defendants further object to Request No. 58 to the extent that it is premature, involving issues that are appropriate for expert testimony. The Navistar Defendants further object to Request No. 58 to the extent it seeks information that is equally available to Lead Plaintiffs in the public domain or available from sources other than the Navistar Defendants, or that is equally available to or already in the possession, custody or control of Lead Plaintiffs or their attorneys and for which the burden on Lead Plaintiffs to obtain the information is no greater than the burden on the Navistar Defendants.

REQUEST NO. 59:

All documents reviewed or used as the basis to formulate answers to Plaintiffs' First Requests for Admission.

RESPONSE:

The Navistar Defendants hereby incorporate their General Objections as and for their objections to Request No. 59. Subject to and without waiving the foregoing objections, the Navistar Defendants state that they will produce non-privileged, responsive documents and information in their possession and control that are located through a reasonable search to the extent such documents have not been previously produced by the Navistar Defendants.

REQUEST NO. 60:

All documents concerning any of the Lead Plaintiffs or other plaintiffs named in the Complaint.

RESPONSE:

The Navistar Defendants hereby incorporate their General Objections as and for their objections to Request No. 60. The Navistar Defendants further object to Request No. 60 as vague, ambiguous and incapable of reasonable ascertainment. The Navistar Defendants further object to Request No. 60 as overly broad and unduly burdensome. Subject to and without waiving the foregoing objections, the Navistar Defendants state that they will produce non-privileged, responsive documents and information in their possession and control that are located through a reasonable search to the extent such documents have not been previously produced by the Navistar Defendants.

REQUEST NO. 61:

All documents concerning Defendants' document preservations obligations in this matter, including memoranda, electronic mail, letters or other correspondence distributed to Defendants and the employees, agents, or affiliates of Navistar regarding those obligations.

RESPONSE:

The Navistar Defendants hereby incorporate their General Objections as and for their objections to Request No. 61. The Navistar Defendants further object to Request No. 61 as vague, ambiguous and incapable of reasonable ascertainment. The Navistar Defendants further object to Request No. 61 as overly broad and unduly burdensome. Subject to and without waiving the foregoing instructions, the Navistar Defendants will produce non-privileged documents and information sufficient to show their document preservation efforts.

Dated: October 29, 2009

Respectfully submitted,

/s/ Sean M. Berkowitz
One of the Attorneys for Defendants
Navistar International Corporation,
Daniel C. Ustian and Robert C. Lannert

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on October 29, 2009, a copy of NAVISTAR DEFENDANTS' OBJECTIONS AND RESPONSES TO LEAD PLAINTIFFS' FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO ALL DEFENDANTS was served on the following by electronic mail and by US First Class Mail:

C. Philip Curley
ROBINSON CURLEY & CLAYTON, P.C.
300 South Wacker Drive, Suite 1700
Chicago, Illinois 60606

The undersigned also certifies that on October 29, 2009, a copy of NAVISTAR DEFENDANTS' OBJECTIONS AND RESPONSES TO LEAD PLAINTIFFS' FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO ALL DEFENDANTS was served on the following by electronic mail and US First Class Mail:

Patrick S. Coffey
LOCKE LORD BISSELL & LIDDELL LLP
111 South Wacker Drive
Chicago, Illinois 60606

B. John Casey